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December 15, 2023

**Via ECF**

The Hon. Robert J. Kugler  
United States District Judge  
USDC, District of New Jersey  
Mitchell H. Cohen Building & U.S.  
Courthouse  
4th & Cooper Streets, Room 1050  
Camden, NJ 08101

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,*  
No. 1:19-md-02875-RBK-SAK (D.N.J.)**

Dear Judge Kugler:

I write on behalf of the Defendants' Executive Committee and the ZHP, Teva, and Torrent Defendants, and with the consent of the Plaintiffs' Executive Committee and Plaintiff MSP Recovery Claims, Series LLC, in accordance with Case Management Order 32B, ECF [2546](#), directing the parties to submit a proposed schedule for supplemental depositions and Rule 702 briefing for damages experts by December 15, 2023.

After meeting and conferring, the parties have agreed to the following supplemental deposition and Rule 702 briefing schedule:

- Supplemental depositions of damages experts are to be completed by January 26, 2024, with the supplemental deposition of Plaintiffs' expert, Rena Conti, scheduled for the week of January 15, 2024, and the supplemental deposition of Defendants' expert, Wayne Gibson, scheduled for the week of January 22, 2024.
- The parties will file their respective opening Rule 702/*Daubert* motions on damages experts on February 5, 2024, with responses due on February 19, 2024, and replies due on February 28, 2024.

Thank you for your attention to these matters. The parties are available to address any questions from the Court.

Very truly yours,

/s/ Gregory E. Ostfeld